

LAW OFFICES OF RAHUL WANCHOO

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TRANSFIELD ER CAPE LIMITED

ECF CASE

Plaintiff,

07 cv 4528 (MGC)

- against -

**REPLY DECLARATION
OF RAHUL WANCHOO IN
SUPPORT OF MOTION TO
VACATE MARITIME ATTACHMENT**

FUCHUEN DIHAI SHIPPING CO. LTD., AND
ZHEJIANG FUCHUEN CO. LTD.

Defendants.

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Rahul Wanchoo hereby declares the following pursuant to 28 U.S.C. §1746:

1. I am a member of the Bar of the State of New York, and I am

admitted to practice before this Honorable Court.

2. I am a partner in the firm of Law Offices of Rahul Wanchoo, attorneys for Defendant, Fuchuen Dihai Shipping Co. Ltd. ("Fuchuen"). I am fully familiar with the matters set forth in this affidavit, and my knowledge of

the matters set forth in this affidavit is based on information provided to me by Fuchuen, its agents and attorneys and my own independent research.

3. I submit this in support of Defendant, Fuchuen's motion to dismiss the Verified Complaint filed by the Plaintiff, Transfield ER Cape Limited ("Transfield") on May 30, 2007 and vacate the maritime attachment.

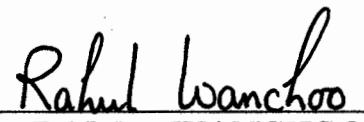
4. I attach hereto as Exhibit 1 a true and accurate copy of Fuchuen's arbitration submission dated July 10, 2007 along with its exhibit pages 1-59.

5. I attach hereto as Exhibit 2 a true and accurate copy of Fuchuen's reply arbitration submission dated July 17, 2007.

6. I attach hereto as Exhibit 3 true and accurate copies of a letter from OGIER to Rodgers & Co. Solicitors (Asia) Pte Ltd dated July 23, 2007 regarding the search undertaken at the British Virgin Islands Registry of Corporate Affairs on June 13, 2007 on Fuchuen Dihai Shipping Co. Ltd. and Defendant Fuchuen's Certificate of Incorporation .

7. I declare under the penalty of perjury that the foregoing is true and correct.

Dated: New York, NY
July 23, 2007


RAHUL WANCHOO